

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

-v-

DOREEN MASTROIANNI,

X
STIPULATION IN SUPPORT
OF APPLICATION FOR
9th OR SUBSEQUENT
ORDER OF CONTINUANCE AND
9th ORDER OF CONTINUANCE

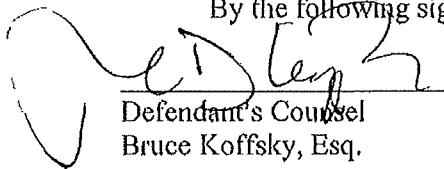
Defendant.

24 Mag. 4187

The United States of America and the defendant jointly request and agree that the time period from 08/20/2025 to 09/17/2025 be excluded from the computation of the period within which an information or indictment must be filed, pursuant to Title 18, United States Code, Section 3161(b) and (h)(7). The defendant was charged with violations of 18 U.S.C. §§ 2, 371, 875(d), 2261(b)(5), and 2261A(2)(B), presented before Magistrate Judge Victoria Reznik on December 11, 2024, and released the same date on bail with the Government's consent.

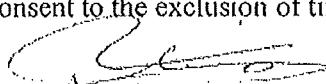
The parties submit that there is good cause for an additional exclusion of time because the parties are exploring a possible disposition of this case prior to trial. On June 6, 2025, the defendant sent the Government a deferred prosecution request. On July 10, the Government informed defense counsel that it did not intend to offer the defendant a deferred prosecution agreement and instead proposed a conceptual pre-indictment plea offer. The defendant is currently assessing that conceptual offer and needs additional time to do so.

By the following signatures we agree and consent to the exclusion of time noted above:



Defendant's Counsel
Bruce Koffsky, Esq.

8/18/25



Assistant U.S. Attorney
Ryan W. Allison

08/18/2025

The defendant states that she has been fully advised by counsel of her rights guaranteed under (a) of the Sixth Amendment to the Constitution; (b) the Speedy Trial Act of 1974, as set forth in Title 18, United States Code, Sections 3161-74; and (c) the plans and rules of this Court adopted pursuant to that Act. The defendant understands that she has a right to be charged by indictment or information, and to have a trial before a judge or jury, within a specified time (excluding certain time periods) under the Constitution and Rules and Laws of the United States identified above. The defendant consents and agrees to the above request, and further authorizes counsel Bruce Koffsky, Esq. to affix her signature on this stipulation.

After discussion and with client's
express consent.

Defendant
DOREEN MASTROIANNI

8/18/25

[continued on next page]

*Bruce Koffsky for
Doreen Mastroianni*

The joint application of the United States of America and the defendant having been heard at a proceeding on the date below, the time period from 08/20/2025 to 09/17/2025 is hereby excluded in computing the time within which an indictment or information must be filed. The Court grants this continuance on the finding that the ends of justice outweigh the interests of the public and the defendant in a speedy trial, for the reasons set forth above. The Court further orders: N/A.

Dated: 8/20/25
White Plains, New York

SO ORDERED

UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK